

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND COMPOUNDING)	
PHARMACY, INC. PRODUCTS LIABILITY)	
LITIGATION)	
)	MDL No. 2419
)	Master Dkt. 1:13-md-02419-RWZ
THIS DOCUMENT RELATES TO:)	
All Actions)	
)	

**THE PLAINTIFFS' STEERING COMMITTEE'S MOTION TO FILE UNDER SEAL
ITS MOTION FOR A PROTECTIVE ORDER REGARDING
THE BOX HILL DEFENDANTS' NOTICES OF DEPOSITION
BY WRITTEN QUESTION [ECF NO. 2319]**

NOW COMES the Plaintiffs' Steering Committee (the "PSC"), pursuant to the Third Amended Protective Order of Confidentiality [Dkt. No. 814] ("Protective Order"), and hereby moves to file certain documents under seal in accordance with the requirements and procedures of the Protective Order. In support thereof, the PSC states as follows:

The PSC deposed two contractors for Brigham & Women's Hospital on June 3 and 4, 2015. The depositions themselves, as well as their accompanying exhibits, are confidential. The PSC incorporates documents and testimony from those depositions into its Motion for Protective Order Regarding the Box Hill Defendants' Notices of Deposition by Written Question.

Accordingly, the PSC respectfully seeks leave to file under seal. A redacted version of the PSC's Motion for a Protective Order will be filed later today via ECF. Unredacted copies will be submitted by hand to the Court and circulated to all counsel appearing in this matter once the Court rules upon this Motion.

WHEREFORE, the PSC respectfully requests this Court accept for filing under seal the PSC's Motion for a Protective Order and its exhibits.

Dated: October 23, 2015

Respectfully submitted,

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Plaintiffs' Steering Committee

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 23, 2015, a true and exact copy of the foregoing was filed with this the Clerk of the Court using the ECF system that sent a notification of this filing to all ECF registered counsel of record via e-mail generated by the Court's ECF system.

/s/ Kimberly A. Dougherty
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